



Annual Performance Report Form

Facility Name: Kerr McGee Chemical LLC - The Dalles, OR

Performance Track ID #: A10 0004

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: April 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☐ Name of your facility: Kerr McGee Chemical LLC
- A.2 ☐ Name of your parent company: Kerr McGee Corporation
- A.3 ☐ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Jeff Thompson
Title: Plant Manager
Phone: 541-296-1808 Fax: 541-296-1598 E-mail: jthompson@kmg.com
- A.4 ☐ Facility's location
Street Address: 100 Tie Plant Rd.
Street Address (cont.):
City/State/Zip Code: The Dalles, OR 97058
- A.5 ☐ Facility's website address (if any): N/A
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:
☐ Fewer than 50 ☒ 50 - 99 ☐ 100 - 499 ☐ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 321114 _____
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No Changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

Type: ISO 14001 certificate extension audit. Scope: The environmental management system of Kerr McGee Chemical LLC, Forest Products Division in The Dalles, Oregon associated with the manufacture of treated cross ties, switch ties and timbers. Dates of Audit: October 23, 2001

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

Scope: The environmental management system of Kerr McGee Chemical LLC, Forest Products Division in The Dalles, Oregon associated with the manufacture of treated cross ties, switch ties and timbers. Dates of Audit: June 19, 2001

c. Was a compliance audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

A compliance audit was conducted by Buz Holloway, Corporate Auditor, on June 19 - 21, 2001. It covered the following topics: air, water, SPCC, Tier II, chemical hygiene, and waste management.

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

An audit of our Performance Track and EMS was performed by EPA Region 10 on August 29, 2001.

There were no findings.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

There were no findings or corrective actions required, as a result of EMS audits.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☐ Yes ☐ No ☒ No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed? *mo/yr* August, 2001

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Nick Bock

Title: Environmental Manager

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* January 2002

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the *reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Emission of VOC's	Reduced emission of VOC's by over 47%, through the use of an air emissions control system and procedural changes.
Hazardous Waste	A reduction in hazardous waste generation was not achieved for 2001 due to closure of several work tanks.
Discharges of Toxics To Wastewater	No progress made on this aspect. Oil and Grease concentration has remained the same as the baseline reporting year.
Emissions of Toxics From Doors (HAPs)	Actual values for this aspect are below our 2001 target.

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Air Emissions

Aspect (see page 16 of the instructions): Emission of VOCs

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	1606	844			1360 (optional)
<i>Measurement Units</i>	lbs VOCs				
<i>Normalizing Factor*</i>	1.0	1.26			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (FT3 of wood treated)				
<i>Normalized Quantity* (per year)</i>	1606	670			1360

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

1. Improved process control of air emissions control system.
2. We converted water scrubber to oil scrubber improving capture efficiency.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.2 Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Waste					
Aspect (see page 16 of the instructions): Hazardous Waste					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	35687	216632			8921 (optional)
<i>Measurement Units</i>	lbs of hazardous waste				
<i>Normalizing Factor*</i>	1.0	1.26			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (FT3 of wood treated)				
<i>Normalized Quantity* (per year)</i>	35687	171930			8921
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

1. We are currently in the process of replacing old process storage and work tanks. Last year, we removed 5 tanks from service and disposed of their tank bottoms as hazardous waste. The amount of hazardous waste reported in 2001 was inflated because of this project.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.3 Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions): Discharges to water					
Aspect (see page 16 of the instructions): Discharges of toxics to water					
	<i>Baseline</i> (as stated in your application)	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment</i> (the goal stated in your application)
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity</i> (per year)	22.3	28.1			20.0 (optional)
<i>Measurement Units</i>	lbs O&G				
<i>Normalizing Factor*</i>	1.0	1.26			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (FT3 of wood treated)				
<i>Normalized Quantity*</i> (per year)	22.3	22.3			20.0
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Actual data appears to have plateaued. We may have reached the maximum efficiency of our wastewater treatment system, additional technology is currently under evaluation.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section C

(continued)

C.4 Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions): Air Emission

Aspect (see page 16 of the instructions): Emissions of toxics

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	1999	2001			2003
<i>Actual Quantity (per year)</i>	446	253			379 (optional)
<i>Measurement Units</i>	lbs HAP				
<i>Normalizing Factor*</i>	1.0	1.26			1.0 (optional)
<i>Basis for your Normalizing Factor*</i>	Production (FT3 of wood treated)				
<i>Normalized Quantity* (per year)</i>	446	201			379

*See pages 15-17 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

1. Procedural changes reduced the amount of time that the cylinder door is open reducing emissions released.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

None

Section D

Public Outreach and Performance Reporting

D.1

Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

An open house was held in the third quarter of 2001 and there were several civic group tours conducted last year.

D.2

Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☐ Website (URL)

☒ Open House

☒ Meetings

☐ Press Releases

☐ Community Advisory Panel

☐ Other

Section E

Self-Certification of Continued Program Participation

On behalf of Kerr-McGee Chemical, LLC - FPD,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr. Jeff Thompson

Title Plant Manager

Phone Number/E-mail Address 541-296-1808 / jthompson@kmg.com

Facility Name Kerr-McGee Chemical, LLC - FPD

Facility Street Address 100 Tie Plant Road

Performance Track Identification Number A10 0004

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.